

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GOLDEN FOOTHILL INSURANCE SERVICES, LLC,
LIFE FACTOR II, LLC, LIFE SHARES II, LLC, EL
DORADO HILLS INSURANCE SOLUTIONS, INC.,
LONE WOLF INSURANCE SERVICES, INC., ELDO
INVESTMENTS, LLC, THE GENESIS LS FUND, LLC,
KTL HOLDINGS, INC., and TATANISHA LEER,

Docket No.: 24-cv-08515

NOTICE OF MOTION

Plaintiffs,

- against -

SPIN CAPITAL, LLC, AVRUMI (a/k/a JOSH)
LUBIN, BMF ADVANCE LLC, GAVRIEL
YITZCHAKOV a/k/a GABE ISAACOV, HI
BAR CAPITAL, LLC, YOEL GETTER a/k/a
JOEL GETA, and YISROEL HERBST,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Declaration with exhibits, the Memorandum of Law, and all the pleadings and proceedings heretofore had herein, Defendants, BMF ADVANCE LLC, GAVRIEL YITZCHAKOV a/k/a GABE ISAACOV, will move this Court before the Honorable Arun Subramanian, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, New York 10005 at a date and time to be set by the Court, for an Order, dismissing this action against Defendants pursuant to 12(b)(2), (b)(5), and (b)(6), and awarding Defendants such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to SDNY Local Rule 6.1(b), opposition papers shall be served on or before March 14, 2025, and Reply Papers shall be served on or March 21, 2025.

Dated: February 28, 2025

/s/ Christopher R. Murray
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Attorneys for Defendants
BMF Advance, LLC
and Gavriel Yitzchakov

To via ECF:
Counsel for all parties

CERTIFICATE OF SERVICE

CHRISTOPHER R. MURRAY, an attorney duly licensed to practice law in the Courts of the State of New York, declares and affirms under penalty of perjury that on February 28, 2025, I served the Defendant's Notice of Motion, Memorandum of Law, and all supporting documents via ECF on counsel for all parties

Dated: February 28, 2025

/s/ Christopher R. Murray
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